

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JAMES JUDAH IN  
SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL (DKT. 280)**

1 I, James Judah, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I submit this declaration in support of Defendants’ Administrative Motion to File  
7 Under Seal (Dkt. 280) related to its discovery letter brief (the “Administrative Motion”) pursuant to  
8 Civil Local Rules 79-5(d)(1)(A) and 79-5(e).

9 3. I have reviewed the following documents and confirmed that the portions identified  
10 merits sealing:

Document	Portions to Be Filed Under Seal
Defendants’ April 24, 2017 Letter Brief to Magistrate Judge Corley (“Defendants’ Letter Brief”)	Redacted Portions
Exhibits A and C to Defendants’ Letter Brief	Redacted Portions
Exhibit B to Defendants’ Letter Brief	Entire Document

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16 4. The above documents – at the identified portions – contain trade secret and confidential  
17 business information, which Waymo seeks to seal.

18 5. Defendants’ Discovery Letter Brief (redacted portions), Exhibits A and C (redacted  
19 portions), and Exhibit B contain, reference, or describe Waymo’s highly confidential and sensitive  
20 business information. Such information includes information on Waymo’s confidential business  
21 strategy, as well as its competitive and market analysis. I understand that Waymo maintains this  
22 information as confidential. The public disclosure of this information would cause significant  
23 competitive harm to Waymo, as its confidential business information and strategy would become  
24 known to competitors who could use such information to Waymo’s disadvantage.

25 6. Waymo’s request to seal is narrowly tailored to those portions of the above-referenced  
26 documents that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on April 28,  
3 2017.

4 By /s/ James Judah

5 James Judah

6 Attorneys for WAYMO LLC  
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